



EPA Region 5 Records Ctr.



284729

Solutia Inc.

W.G. Krummrich Plant

500 Monsanto Avenue

Sauget, Illinois 62206-1198

Tel 618-271-5835

December 9, 2002

Mr. Michael Ribordy
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

**Re: Sauget Area 2 Site – October 3, 2002 Unilateral Administrative Order (UAO)
Groundwater Operable Unit
1 - December 2002 Monthly Report**

Dear Mr. Ribordy,

Attached is the December 2002 Monthly Report for the Sauget Area 2 Site October 3, 2002 Unilateral Administrative Order (UAO) - Groundwater Operable Unit. This submittal is in fulfillment of the monthly reporting requirements of the UAO, Section XII, paragraph 62, Progress Reports.

Sincerely,
Solutia Inc.

Steven D. Smith
Project Coordinator

cc: S. Bron - IEPA
Linda Tape – Husch & Eppenberger
Mayor D. Reed - Cahokia
Village of Sauget – c/o P. H. Weis & Associates (Attn: Brian Nelson)
Mayor P. Sauget - Sauget, IL
Richard Williams - Solutia

Sauget Area 2 Site - Sauget, Illinois

October 3, 2002 UAO – Groundwater Operable Unit

Monthly Report

Date of Report: December 6, 2002
Period Covered: November 1, 2002 - November 30, 2002
Next Report Period: December 1, 2002 - December 31, 2002

Background

A Unilateral Administrative Order (UAO) was issued to a number of Potentially Responsible Parties, including Solutia, by the U. S. EPA on October 3, 2002, requiring installation of a 3,500 foot long, “U”-shaped, fully penetrating, jet grout barrier wall to be installed between the downgradient boundary of Sauget Area 2 Site R and the Mississippi River. The wall will be placed to abate the release of impacted groundwater to the river. The UAO (U.S. EPA Docket No. V-W-’02-C-716) also requires installation of three partially penetrating groundwater recovery wells to be installed inside the “U”-shaped barrier wall. The recovery wells will be used to control groundwater moving to the wall. Extracted groundwater will be treated and ultimately discharged to the Mississippi River in compliance with all applicable or relevant and appropriate requirements. Groundwater quality, groundwater level, sediment and surface water monitoring will be used to ensure acceptable performance of the interim groundwater remedy. The work required by the UAO is an interim remedy for the Groundwater Operable Unit at the Sauget Area 2 Site. The remedy was specified in a Record of decision issued on September 30, 2002.

The UAO became effective on November 15, 2002. By letter dated November 15, 2002, Solutia informed the U. S. EPA of its intention to comply with the terms of the UAO.

Agency Actions / Communications

- A conference with various recipients of the UAO was held at U. S. EPA offices in Chicago on November 6, 2002.

Work Performed during the reporting period

- In accordance with Article XXV, paragraph 99, of the UAO, Solutia notified the U. S. EPA of its intention to comply with the terms of the UAO

- In accordance with Article VII, paragraph 41, of the UAO, Solutia submitted a Notice of the UAO to the Recorder of Deeds and sent a copy of that notice to the U. S. EPA.
- In accordance with Article XVI, paragraph 71, of the UAO, Solutia advised the U. S. EPA that Steven D. Smith was the designated Project Coordinator, subject to EPA concurrence.
- Preparation of the RD/RA Work Plan started.

Data Submittal

No data are submitted with this report.

Work scheduled for next reporting period

- The RD/RA Work Plan will be submitted by December 30, 2002.
- Financial assurances required by Article IX, paragraph 54, will be submitted by December 15, 2002.

Problems and Solutions

None

Submittal Schedule Status

See attached UAO schedule

Issues under review

None

Comments

None

Sauget Area 2 Site - Sauget, Illinois

October 3, 2002 UAO – Groundwater Operable Unit

SCHEDULE

Deliverable	Description	Due Date
Effective Date		15-Nov-02
Notice of Intent to Comply	On or before effective date	15-Nov-02
Designation of Project Coordinator and Contractors	15 days after effective date	30-Nov-02
Access	60 days after effective date	14-Jan-03
Notice of land ownership to appropriate governmental office	5 days after effective date	20-Nov-02
Notice of land ownership recording and indexing to U.S. EPA	15 days after effective date	30-Nov-02
RD/RA Workplan	45 days after effective date	30-Dec-02
Assurance of ability to complete work	30 days after effective date	15-Dec-02
Monthly Reports	To be submitted on or before the 10 th date of each month following the effective date of the UAO	10-Dec-02
Construction Completion Report	Within 30 days of a successful final inspection	TBD